

1 **SAO**  
2 BYRON E. THOMAS, ESQ. (NBN 8906)  
3 E-mail: [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)  
4 LAW OFFICES OF BYRON THOMAS  
5 3275 S. Jones Blvd, Ste 104  
6 Las Vegas, Nevada 89146  
7 Telephone: 702 747-3103  
8 *Attorneys for Defendants*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF, NEVADA**

8 HILLCREST INVESTMENTS, LTD., a  
9 Canadian Corporation; AMERGOSA  
10 ENTERPRISE, LLC.,  
11 Plaintiffs,

12 vs.

13 AMERICAN BORATE COMPANY a foreign  
14 corporation; AMERICAN BORATE COMPANY  
15 OF TEXAS a foreign corporation, STATE  
16 ENGINEER, STATE OF NEVADA,  
17 DEPARTMENT OF CONSERVATION AND  
18 NATURAL RESOURCES, DIVISION OF  
19 WATER RESOURCES, A Nevada Political  
20 Subdivision; RAMM Corporation, a Nevada  
21 Corporation; UNITED STATES FISH AND  
22 WILD SERVICE a division of the UNITED  
23 STATES; NATIONAL PARK SERVICE, a  
24 division of the UNITED STATES; and DOES I-  
25 V, ROES VI-X,

26 Defendants.

Case No 2:21-cv-00964-RFB-NJK

**STIPULATION TO EXTEND DEADLINE  
TO FILE RESPONSE TO UNITED  
STATES FISH AND WILDLIFE SERVICE  
AND THE NATIONAL PARK SERVICE  
MOTION TO DISMISS  
(FIRST REQUEST)**

22 **COMES NOW**, Plaintiffs and Defendants United States Fish and Wildlife Service and the  
23 National Park Service (collectively, "Federal Defendants") by and through their respective  
24 attorneys of record hereby stipulate and agree as follows:

25 ///

26 ///

27 ///

28

1 On June 21, 2021, the Federal Defendants filed a Motion to Dismiss ("Motion"). See  
2 (ECF No. 17). Plaintiff's response to the Motion is due on July 6, 2021. The parties agreed to  
3 extend the response deadline to July 14, 2021, to accommodate workload and scheduling conflicts  
4 for Plaintiff's counsel. The parties also stipulate that the Federal Defendants' Reply is due on July  
5 26, 2021. This is the parties' first request..  
6

7  
8 **LAW OFFICES OF BYRON  
THOMAS**

9  
10 /s/ David L. Negri

/s/ Byron E. Thomas

11 **CHRISTOPHER CHIOU**  
Acting United States Attorney  
District of Nevada  
12 **GREG ADDINGTON**  
Assistant United States Attorney  
13 **JEAN E. WILLIAMS**  
Acting Assistant Attorney General  
U.S. Department of Justice  
14 **DAVID L. NEGRI,**  
Trial Attorney Environment and  
Natural Resources Division  
15 U.S. Attorney's Office 1290 West  
Myrtle Street, Suite 500 Boise,  
16 Idaho 83702 (208) 334-1936  
17  
18  
19  
20  
21  
22

Byron E. Thomas, Esq.  
Bar # 8906  
3275 S. Jones Blvd. Ste. 104  
Las Vegas, NV 89146

Attorney for Plaintiffs

23 **IT IS SO ORDERED.**

24  
25   
**RICHARD E. BOULWARE, II**  
**United States District Court**

26 DATED this 8th day of July, 2021.  
27  
28